

Message

---

**From:** Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]  
**Sent:** 11/21/2018 3:10:05 PM  
**To:** Shamim Reza [sreza@bry.com]  
**Subject:** RE: Quad Oa Question

Hi Shamim,

I am taking a look into this question but had a quick follow up for you. Is the purpose of the re-perforation to clean out sediment that may be clogging the wellbore? Or would this action also extend the wellbore?

Thanks,  
Karen

\*\*\*\*\*

Karen R. Marsh, PE  
US EPA, OAQPS, Sectors Policies and Programs Division  
Fuels and Incineration Group  
109 TW Alexander Drive, Mail Code E143-05  
Research Triangle Park, NC 27711  
Direct: (919) 541-1065; email: marsh.karen@epa.gov

---

**From:** Shamim Reza <sreza@bry.com>  
**Sent:** Wednesday, November 07, 2018 3:09 PM  
**To:** Marsh, Karen <Marsh.Karen@epa.gov>  
**Subject:** Quad Oa Question

Hello Karen,

I have a question and wanted to check with you my thought. Please advise. Thank you

### **Question**

Does re-perforating (including new perforations in an existing wellbore) an “existing well” (i.e. grandfathered well site) constitute a “modification” thereby triggering NSPS OOOOa (or Rule) LDAR applicability under 40 CFR §60.5365a(i) et al?

### **My thought**

No. Based on EPA guidance, re-perforating an existing well, by itself<sup>[1]</sup>, should not trigger the NSPS OOOOa LDAR requirements since it does not satisfy the criteria in §60.5365a(i)(3).

1. During the rulemaking process, EPA (or Agency) indicated that §60.5365a(i)(3) reflects the Agency’s intent of what activities performed on an “existing facility” (as defined in §60.2) constitute a “modification” for well site LDAR applicability.
2. Therefore, activities not listed in §60.5365a(i)(3), do not constitute a “modification” and would not trigger applicability of the NSPS OOOOa LDAR requirements for well sites.
3. The activities listed in §60.5365a(i)(3) which constitute a “modification” are:
  - a. A new well is drilled at an existing well site
  - b. A well at an existing well site is hydraulically fractured, or

---

<sup>[1]</sup> If perforation/re-perforation is done in conjunction with drilling a new well or a hydraulic fracturing/refracturing job then it would trigger NSPS OOOOa well site LDAR applicability.

- c. A well at an existing well site is hydraulically re-fractured
4. Re-perforation is not listed in §60.5365a(i)(3).
  5. Re-perforation does not meet the definitions of “hydraulic fracturing” or “hydraulic refracturing” in §60.5430a since no “pressurized fluids” are sent downhole “to penetrate tight formations”.
  6. Although “drilling” a new well is not defined in the Rule, a plain language understanding of that phrase would involve creating a new wellbore hole or some type of sidetrack using equipment designed to drill into the subsurface. Re-perforation does not involve creating a new wellbore or sidetrack.
  7. **Since the activity is not listed in §60.5365a(i)(3) and does not constitute drilling a new well, hydraulically fracturing, or hydraulically refracturing a well, re-perforation, alone, of an existing well at an “existing facility” does not constitute a “modification” and therefore does not trigger NSPS OOOOa LDAR applicability.**
  8. During the final rulemaking for NSPS OOOOa, commenters explicitly requested that EPA expand the “modification” criteria in §60.5365a(i)(3) to include re-perforation (including perforating a new zone in the existing wellbore) and acidizing well workover activities. **The Agency declined to make the changes** and instead indicated that EPA wanted to define modifications to be “clearly identifiable criteria that can be easily recognized by operators and regulators”.



**Shamim Reza**  
Sr. EH&S Rep.  
Direct: (661) 616-3889  
Cell: (661) 717-1634

---

*Be Safe...For What Matters Most!*

---